

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:
Marjorie Evelyn Berrell,
Debtor

Chapter 13

CASE NO: 1:23-bk-02142-HWV

MOTION FOR WAGE ATTACHMENT

AND NOW, the Debtor, Marjorie Evelyn Berrell, by and through counsel, Dawn M. Cutaia, respectfully represents:

1. The Debtor filed a Chapter 13 Petition on September 9, 2023.
2. The Debtor receives regular income from employment with South Eastern School District, which may be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
3. The likelihood of success in this case will increase if the Motion for Wage Attachment is granted.

WHEREFORE, the Debtor respectfully requests this Court enter an Order directing the above-mentioned employer to Pay Trustee in the amount set forth in the attached Order.

Date: 1/6/25

Respectfully Submitted,

By: **/s/ Dawn M. Cutaia**
Attorney for Debtor
Fresh Start Law, PLLC
Supreme Court ID 77965
Attorney for Debtor
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ORDER TO PAY TRUSTEE

AND NOW, upon consideration of the above-referenced Debtor having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS HEREBY ORDERED that until further Order of this Court:

Employer: South Eastern School District
377 Main St.
Fawn Grove, PA 17321

Shall deduct from Marjorie Evelyn Berrell's income the sum of \$289.03 each bi-weekly pay, beginning as soon as practicable upon receipt of the Order but no later than the first pay in February, 2025, and deduct this same amount each pay thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor and remit the deducted sums to:

Jack N. Zaharopoulos
Chapter 13 Trustee
P.O. Box 6008
Memphis, TN 38101-6008

IT IS FURTHER ORDERED that checks issued to the Trustee pursuant to this Order shall include the above-captioned case number on the face of the check.

By the Court